

**In the United States District Court
Eastern District of Arkansas
Western Division**

DAREL ADELSBERGER; AND
ANNETTE ADELSBERGER

PLAINTIFFS

v.

No. 4:19-cv-003-SWW

UNION PACIFIC RAILROAD COMPANY

DEFENDANT

Renewed Joint Motion for Entry of Agreed Protective Order

The parties jointly move the Court to enter the proposed protective order attached as EXHIBIT 1, and in support state:

1. To address any issues involving confidential information in this case, the parties have agreed to the terms of a protective order.
2. Their agreed proposed order is attached as EXHIBIT 1.
3. The parties feel that the proposed order strikes an appropriate balance between protecting what needs protecting, and disclosing what should be public.
4. The parties also believe that this proposed order addresses the Court's previously expressed concerns about the procedure for seeking leave to file confidential documents under seal. *See № 10; see also EXHIBIT 1 at p. 4.*

Accordingly, the parties jointly move the Court to enter the agreed proposed protective order attached as EXHIBIT 1.

Respectfully submitted,

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